

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

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| IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION | Master File No. 2:12-MD-02327 MDL No. 2327 |
| THIS DOCUMENT RELATES TO ALL CASES | JOSEPH R. GOODWIN U.S. DISTRICT JUDGE |

**NOTICE OF INTENT TO FILE DEFENDANTS' MOTION FOR AN ORDER TO SHOW
CAUSE WHY CLAIMS SHOULD NOT BE DISMISSED BASES UPON LACK OF
STANDING AND/OR JUDICIAL ESTOPPEL**

Defendants Johnson & Johnson, Ethicon, Inc., and Ethicon LLC hereby give notice of their intent to file the attached Motion for an Order to Show Cause in each case listed on Exhibit A, attached. The Motion for an Order to Show Cause and Brief in Support are attached here to as Exhibit B and C, respectively. Pursuant to the Court's instructions, the motion will be filed in 30 individual cases per day beginning November 4, 2013, and responses should be filed in the respective individual cases.

Respectfully submitted,

ETHICON, INC., JOHNSON & JOHNSON, and
ETHICON LLC

/s/ David B. Thomas

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/s/ Christy D. Jones

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CERTIFICATE OF SERVICE

I, Christy D. Jones, certify that on November 1, 2013, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Christy D. Jones

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JOHNSON, and ETHICON LLC